

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)
) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)

**ORDER GRANTING MOTION TO COMPEL RESPONSES TO
INTERROGATORIES**

This matter having come before the Court on the motion of Syncora to compel the Debtor to respond to interrogatories (the “Motion to Compel”), the Court having reviewed Syncora’s Motion to Compel; and the Court having determined that the legal and factual bases set forth in the Motion to Compel establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. Syncora’s Motion to Compel is GRANTED.
2. The City’s improper 19 General Objections are stricken.
3. The City’s improper objections included in its responses are stricken.
4. The City shall provide full and fair responses to each of Syncora’s interrogatories.
5. Where applicable, the City shall identify specific responsive documents by Bates number in its responses.

6. The parties are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.

STEVEN W. RHODES
United States Bankruptcy Judge